

MEMO ENDORSED

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/5/21

LUIS Sanchez.
56930-054
P.O. Box 26035
Beavmont, TX. 77722

Sept. 24, 2021

Clerk of Court.
U.S. District Court.
500 Pearl St. Rm. 120
New York, NY 10007-1312

IN Ref: 04-CR-36(VEC)

Dear Clerk,

Please find enclosed a motion I would like
to file with the Court. Thank-you for your time
and assistance.

Best Regards



UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK.

LUIS SANCHEZ,

Defendant.

CASE NO: 04-CR-36 (VEC)

- VS -

UNITED STATES OF AMERICA,
Plaintiff.

DEFENDANTS Motion FOR ENLARGEMENT OF TIME TO
REPLY TO GOVERNMENT'S RESPONSE TO DEFENDANT'S Motion
FOR REDUCTION OF SENTENCE AND RENEWED Motion FOR
Appointment OF Counsel

Before the Court is a Motion filed Pursuant to 18 U.S.C.
§ 3582(c). (see Court's order date 9/2/21)¹ by Mr. Luis Sanchez,
the "Defendant" with the assistance of an inmate Paralegal.²
Defendant Comes here and respectfully Moves the Court to enlarge
the time for him to reply to the government's response for
Good Cause. Furthermore, Defendant incorporates a renewed Motion
for appointment of Counsel with illustrations, also with the

¹ The Court construed the Motion as being filed pursuant to
18 U.S.C. § 3582.

² Defendant apologizes to the Court for the handwritten pleading
HOWEVER, due to COVID-19 restrictions it is the best he
can produce and thus, begs the Court's indulgence.

the assistance of an inmate Paralegal. [See Attached B].

Relevant History

Defendant filed a motion in regard to the Calculation of his Jail Credit. The Court in an order dated 9/2/2021 Granted the motion for Compassionate release. Furthermore, the Court ordered that the Government is to respond not later than October 1, 2021, and provided Defendant leave to reply to the Governments response no later than October 22, 2021. Subsequently to the filing of that Motion, Defendant's sister meet with an untimely death inconsequent leaving to Small Children with out an adequate Care giver. Defendant filed a Supplement to his motion asking the Court to include this in its Consideration of the Motion for Compassionate release. Moreover, Defendant Piled a motion for appointment of Counsel to assist him to Obtain and present proper documentation of the sad event. Finally, Defendant Comes here to ask for an enlargement of time to reply to the Government's response out of an abundance of Caution. Furthermore, incorporates a renewed motion for appointment of Counsel with illustrations [Attached A] to support appointing Counsel.

Good Cause For Enlargement of Time To Reply

Defendant is housed at USP Beaumont. Recently, USP Beaumont suffered an outbreak of Covid-19 in the unit Defendant is housed in resulting in all inmates being quarantined to their cells. As a result, Defendant has no access to the Law Library or Legal Assistance. Thus, through the inmate paralegal, out of an abundance of Caution, Moves the Court for an enlargement of time to reply to the government's response.^{3/} Furthermore, Defendant incorporates a renewed motion for appointment of Counsel with supplementation.

^{3/} Defendant will make every effort to meet the initial deadline, but seeks this relief out of an abundance of Caution.

Renewed Discussion For Appointment of Counsel

The Court should appoint Defendant Counsel in the interest of Justice. Although Defendant is being assisted by an inmate who has limited training in the legal field at best, such assistance is severely restricted, even moreso by the recent outbreak of COVID-19, thus, Defendant needs assistance of Counsel with the enlarged resources and access to records to assist the Court in regard to the recent death of Defendant's sister that was critical to the future of two small children.

Turning to the renewed motion for appointment of Counsel. Beyond the Good Cause discussed above is the fact two small children desperately need the assistance of the defendant. However, he is currently confined to his cell, wondering and worrying about his future and most importantly wondering and worrying about the future and well being of those two children. The paralegal assisting Defendant has been advocating to the prisoners to take advantage of the programs and incentives to get home to the ones that "really matter." Said paralegal, himself was

a Career Criminal filled with the blame game, full of resentment and distrust of the legal system. However, he had a beautiful grandson brought into his life. Thus, he attempted to educate himself and through that education grew understanding, understanding of what a true liability he actually was on Society. For instance, he would not want someone selling or offering his grandchild drugs, therefore, how can he be resentful toward Congress and Society for protecting their children and loved ones from the same through Criminal Laws. The answer, he could not. In other words, the introduction of that grandchild and responsibility went along way to the maturing of the paralegal. Through the acceptance and understanding of the liability drugs are to Society, he began to advocate for education and programming. (see attached A). Most importantly, here your honor, there are two small children who need their uncle desperately. Perhaps that added responsibility will assist Defendant to come to the same realization the assisting paralegal did. Defendant cannot obtain and provide the Court the

Documents needed to provide the Court with a complete and authentic understanding of the situation. Therefore, appointment of Counsel is needed to meet Justice. Justice here is not to deny these Children the support of their uncle without a comprehensive and complete review of the facts. As this Country, struggled to abandon mass incarceration of those with substance abuse issues and to restore the integrity of our Criminal Justice System. We must remember the ones that really matter. Because as they grow and teach their Children it will be that process that ultimately restores the trust and integrity of the Criminal Justice System. As attached C demonstrates, Defendant is actually trying, and these Children need him. It may be the case, once all the facts are in the Court determines, Defendant would do more harm than good, it is not a decision for the paralegal, but the Court. He can only attest to the fact education and responsibility brings maturity and understanding. In other words, give the Children a fair chance and

take the simply and small step of providing Counsel.
Such a small step goes far to restoring the integrity
of the Criminal Justice System. Accordingly, this
Court should appoint Counsel in the interest of
Justice.

Respectfully Submitted on 9/25/2021



LUIS SANCHEZ


56930-054

USP Beaumont.

P.O. Box 26030

Beaumont, TX 77725

Motion DISMISSED as moot in light of
the Court's appointment of counsel for
Mr. Sanchez at Docket 291. The Clerk
of Court is respectfully directed to mail
a copy of this endorsement and the
order at Docket 291 to Mr. Sanchez and
to note the mailing on the docket.
SO ORDERED.


10/5/21

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Certificate of Service

I, LUIS SANCHEZ hereby certify that I have served a true and correct copy of the following:

~~Motion~~ For Enlargement of
Time to respond and renewed
~~Motion~~ For Appointment of Counsel.

which is deemed filed at the time it was delivered to prison authorities for forwarding [Houston v. Lack 101 L.Ed.2d 245 (1988)] upon the defendant(s) and or his/her attorney(s) of record by placing same in a sealed, postage prepaid envelope addressed to :

John Jay O'Donnell, Jr.
U.S. Atty's office SDNY.
One St. Andrews Plaza.
New York, NY. 10007

and by depositing same in the United States Mail at the United State Penitentiary,
Beaumont on this 25 day of Sept 2021.

Luis Sanchez
(Name)

P.O. Box 26030
(Address)

Beaumont, Tx. 77720
(City, State, Zip)

ATTACHMENT

(A)

Forever Stamps
U.S. STATES

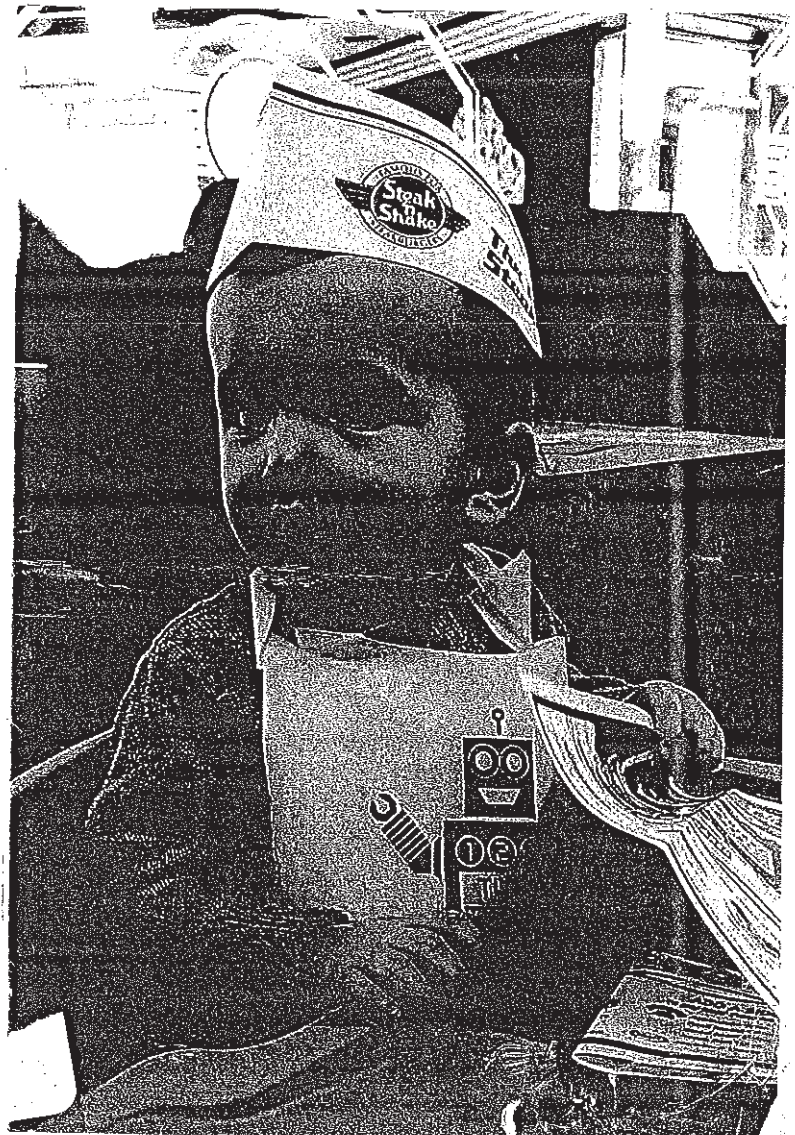
They A SAVANNAH PICTURE IS WORTH A THOUSAND WORDS WHAT'S REALLY IMPORTANT

Breaking News: That dude on TV with the Funny Hair Cut I think his Name is Stump is gonna let my grandpa come home earlier from prison if he will Program. (I am not sure what program means) but Momma said it was like learning your ABC'S, © I don't know much about My grandpa because he has been in prison since way before I was born, but I do know he is tired of being in prison and he is definitely not stupid, and most of all he loves me very very much. I know my grandpa is gonna Spend as much time learning his ABC's as he can. Shucks! I am gonna get Momma to call old Stump and tell him if he will let my PA PA come home sooner. I will learn my ABC's too. So have you got anybody you love enough to learn your ABC's ??? I hope so. Well gotta go. gotta get me and grandpa some fishing poles cause he is coming home sooner than expected!!! See you later. Maybe if you learn yours you Come too and bring the ones that REALLY MATTER!!!!

Judge Caproni,

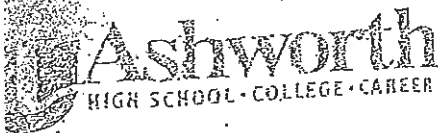
I respectfully ask you to Consider what results the small step of Appointing Counsel here would have on restoring the integrity of our Justice system. Would the integrity benefit from those two children knowing this Court provided means to fully Consider whether to place those children's uncle back into their lives. Frankly, in my humble opinion, it would go along way, because the ones that really matter will ultimately decide that integrity. Thank-you

Rebecca



ATTACHMENT

(B)



September 27, 2018

AC1502334
Ricky Denton #51419-179
USP Pollack
PO Box 1000
Air Base Rd
Pollack, LA 71467

179 Service Address:

Ricky Denton
#51419-179
USP Beaumont
P.O. Box 26030
Beaumont, TX. 77720

To Whom It May Concern:

The above named student enrolled in the Paralegal Studies Associate Degree Program on March 26, 2015. The student completed all coursework requirements as of January 17, 2017. The Associate Degree programs consist of 60 semester credit hours. There are four semesters with five courses in each semester. Each course constitutes three semester hours of credit. Students are required to complete a semester exam at the end of each semester and 20 courses to meet the requirements for graduation. This student's diploma will be issued within 30 days of the tuition being paid in full.

The Associate Degree programs at Ashworth College are accredited by the Accrediting Commission of the Distance Education Accrediting Commission (DEAC) in Washington, D.C. The DEAC is listed by the U.S. Department of Education as a nationally recognized accrediting agency. Ashworth College also meets the accreditation requirements of the Georgia Nonpublic Postsecondary Education Commission. If you need further information please contact the school at 1-800-224-7234.

Sincerely,

Karen Dugans

Karen Dugans
Education Specialist

ices

**Grade Report**

Student Name: Ricky Denton #51419-179
 Graduated: Not Graduated
 Cumulative GPA: 2.85

Student #: AC1502334
 School: Ashworth College
 Degree Type: Associate of Applied Science

Course ID	Course Title	Completed	Status	Grade
C01	Introduction to Business	04/29/2015	Pass	90
C02	Business English	07/15/2015	Pass	77
C12	Business Law	06/23/2015	Pass	94
P01	Introduction to Paralegalism I	07/17/2015	Pass	93
A01	Introduction to Accounting	01/17/2019	Pass	86
P02	Introduction to Paralegalism II	08/03/2015	Pass	95
C07	Personal Finance	09/22/2015	Pass	86
C05	Business Communication	09/17/2015	Pass	87
C06	Business Ethics	11/12/2018	Pass	84
C08	American Government	11/19/2015	Pass	83
A02	Principles of Accounting I	10/03/2018	Pass	76
P03	Torts	10/07/2015	Pass	98
P04	Civil Litigation	11/12/2015	Pass	86
C04	Introduction to Psychology	01/21/2016	Pass	84
C09	Principles of Finance	11/20/2018	Pass	85
P05	Criminal Law and Procedures	12/15/2015	Pass	99
P06	Real Estate Law	01/19/2016	Pass	93
A03	Principles of Accounting II	12/31/2018	Pass	81
C17	College Mathematics	02/19/2016	Pass	90
C11	Macroeconomics	02/05/2019	Pass	78
P07	Law Office Management	03/02/2016	Pass	95
C10	Introduction to Computers	04/20/2016	Pass	78
C13	Microeconomics	07/30/2019	Pass	84
P08	Family Law	04/04/2016	Pass	95
A04	Intermediate Accounting I	06/13/2019	Pass	81
P09	Legal Research and Writing	04/14/2016	Pass	94
A05	Accounting Spreadsheet Fundamentals	01/31/2019	Pass	82
P10	Wills, Trusts, and Estates	05/26/2016	Pass	88
A06	Intermediate Accounting II	09/04/2019	Pass	71
C14	Income Tax Fundamentals	10/20/2016	Pass	73

Legend: A: 90-100 | B: 80-89 | C: 70-79 | D: 60-69 | F: Below: 60

ATTACHMENT

(c)



Individualized Needs Plan - Program Review (Inmate Copy)

SEQUENCE: 01211358

Dept. of Justice / Federal Bureau of Prisons

Team Date: 01-15-2021

Plan is for inmate: SANCHEZ, LUIS 56930-054

Facility: BMP BEAUMONT USP
 Name: SANCHEZ, LUIS
 Register No.: 56930-054
 Age: 44
 Date of Birth: 04-07-1976

Proj. Rel. Date: 12-01-2024
 Proj. Rel. Mthd: GCT REL
 DNA Status: ALP01511 / 06-08-2011

Detainers

Detaining Agency	Remarks
NO DETAINER	

Current Work Assignments

Fac	Assignment	Description	Start
BMP	UNASSIGNED	UNASSIGNED	02-26-2020

Current Education Information

Fac	Assignment	Description	Start
BMP	ESL HAS	ENGLISH PROFICIENT	08-14-2009
BMP	GED EN	ENROLL GED NON-PROMOTABLE	02-11-2016
BMP	GED SAT	GED PROGRESS SATISFACTORY	11-16-2016

Education Courses

SubFac	Action	Description	Start	Stop
BMP	C	CDL,TUE&WED, 1830-2030 RPP 6	01-25-2020	03-31-2020
POL	W	SP GED CLASSROOM 5 1400-1530	09-17-2019	12-26-2019
POL	W	MON-FRI 12:30PM SPAN GED CLASS	03-29-2019	09-17-2019
POL	C	RPP 3: BASIC BANKING NEEDS	01-01-2019	03-29-2019
POL	C	CONSTITUTIONL LAW	01-01-2019	03-29-2019
TRV	W	SPANISH GED 12:30-2:00, M-F	10-19-2017	08-15-2018
TRV	C	CHALLENGE TO CHANGE ACE PROG.	02-05-2018	03-31-2018
TRV	C	BASIC MATH SKILLS - ACE	02-05-2018	03-31-2018
TRV	C	FILE CRITIQUE 1 - ACTION	02-05-2018	03-31-2018
TRV	C	SPANISH CDL ACE	02-05-2018	03-31-2018
TRV	C	ANTHROPOLOGY ACE CLASS	11-20-2017	02-06-2018
TRV	C	INFECT. DISEASE PREVENT(HN 1)	09-26-2017	09-26-2017
COM	C	STEP FORWARD	03-31-2017	03-31-2017
COP	W	ROOM 2 SGED 7:30 - 9:30AM M-F	02-11-2016	12-27-2016
COP	C	PHOTO CLASS	03-28-2016	04-04-2016
EST	C	INFECTIOUS DISEASE PREVT(HN#1)	05-07-2015	05-07-2015
EST	C	STRATEGIC PLANNING (PF#3)	04-06-2015	05-06-2015
BEN	C	ACE-18 HRS CDL CLASS-RPP#6	11-30-2013	03-13-2014
BEN	C	EMPOWERING YOURSELF	09-20-2013	12-10-2013
BEN	C	ACE-PERSONAL MANAGEMENT-16	07-09-2013	09-19-2013
BEN	C	BASIC CASE LAW MON 12:00	07-09-2013	09-19-2013
BEN	C	SPAN PARENTING-TUES 1-2PM	02-04-2013	05-28-2013
BEN	C	ELECTRONIC LAW LIBRARY INTRO	01-10-2013	02-06-2013
BEN	C	RPP DISP OF PROPERTY(5)	01-10-2013	01-10-2013
MCK	W	SPAN GED CLASS 1,1000-1130,M-F	03-20-2012	11-20-2012
MCK	C	SETTG.INTENTIONS TH.12:30-3:00	12-12-2011	12-12-2011
ALP	W	ENGLISH PROF CLSS M-F 1245-143	12-07-2009	06-16-2011
ALP	C	CARDIOVAS CYCL.M/W/F 1830-1930	01-07-2010	03-26-2010
ALP	W	ENGLISH PROF CLSS M-F 0930-1130	08-17-2009	12-01-2009
ALP	C	BASIC ESL M-F 9:30-11:30 AM	01-07-2008	08-17-2009
ALP	C	COMMERCIAL DRIVER	10-07-2008	01-06-2009
ALP	C	PLYO/MEDICINE BALL SAT 0830	04-10-2008	06-30-2008

- For all intent
and purpose
programming stopped
due Covid-19
in april of
2020. That
is why the
effort stop
there.

Discipline History (Last 6 months)

Hearing Date	Prohibited Acts
** NO INCIDENT REPORTS FOUND IN LAST 6 MONTHS **	



Individualized Needs Plan - Program Review (Inmate Copy)

SEQUENCE: 01211358

Dept. of Justice / Federal Bureau of Prisons

Team Date: 01-15-2021

Plan is for inmate: SANCHEZ, LUIS 56930-054

Current Care Assignments

Assignment	Description	Start
CARE1	HEALTHY OR SIMPLE CHRONIC CARE	10-10-2007
CARE1-MH	CARE1-MENTAL HEALTH	09-24-2010

Current Medical Duty Status Assignments

Assignment	Description	Start
C19-T NEG	COVID-19 TEST-RESULTS NEGATIVE	09-05-2020
PAPER	LEGACY PAPER MEDICAL RECORD	07-24-2019
REG DUTY	NO MEDICAL RESTR--REGULAR DUTY	10-04-2011
YES F/S	CLEARED FOR FOOD SERVICE	10-04-2018

Current Drug Assignments

Assignment	Description	Start
ED DECL V	DRUG EDUCATION DECLINE-VOL	01-22-2014
NR WAIT	NRES DRUG TMT WAITING	05-01-2019

FRP Details

Most Recent Payment Plan

FRP Assignment: COMPLT FINANC RESP-COMPLETED Start: 11-11-2008

Inmate Decision: AGREED 50% Frequency: MONTHLY

Payments past 6 months: \$0.00 Obligation Balance: \$0.00

Financial Obligations

No.	Type	Amount	Balance	Payable	Status
1	ASSMT	\$100.00	\$0.00	IMMEDIATE	COMPLETEDZ

** NO ADJUSTMENTS MADE IN LAST 6 MONTHS **

Payment Details

Trust Fund Deposits - Past 6 months: \$1,070.00

Payments commensurate ? Y

New Payment Plan:

** No data **

Progress since last review

Due to Covid19, Education and Recreation Programs were suspended. Staff from Unit Team, Recreation, and Education were reassigned to work custody post. New goals will be established at Inmate Sanchez' next program review.

Next Program Review Goals

Due to Covid19, Education and Recreation Programs were suspended. Staff from Unit Team, Recreation, and Education were reassigned to work custody post. New goals will be established at Inmate Sanchez' next program review.

Long Term Goals

Due to Covid19, Education and Recreation Programs were suspended. Staff from Unit Team, Recreation, and Education were reassigned to work custody post. New goals will be established at inmate Sanchez' next program review.

RRG/HC Placement

No.
Management decision - will review 17-19 months prior to release.

Comments

BP-338 Next Update: January 2022
Current Points: 24



Individualized Needs Plan - Program Review (Inmate Copy)

SEQUENCE: 01211358

Dept. of Justice / Federal Bureau of Prisons

Team Date: 01-15-2021

Plan is for inmate: SANCHEZ, LUIS 56930-054

Name: SANCHEZ, LUIS
Register No.: 56930-054
Age: 44
Date of Birth: 04-07-1976

DNA Status: ALP01511 / 06-08-2011

Inmate (SANCHEZ, LUIS, Register No.: 56930-054)

Date

Unit Manager / Chairperson

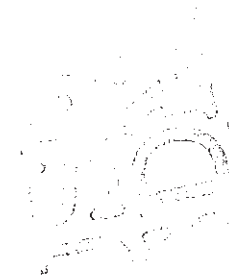
Case Manager

Date

Date

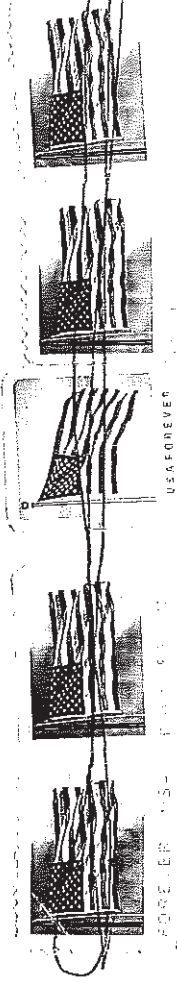
Ricky Denton # S1419-179
USP Beaumont.
P.O. Box 26030
Beaumont, TX. 77720

PLEASE
STICK
TO THE
STAMP



Clerk of Court.
U.S. District Court.
500 Pearl St. Rm 120
New York, NY 10007

Crim. JR
Dkt



FOREVER
10/10/21
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